ATTACHMENT 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Local	)	CC Docket No. 96-98
Competition Provisions in the	)	
Telecommunications Act of 1996	)	
	)	
Interconnection between Local	)	CC Docket No. 95-185
Exchange Carriers and Commercial	)	
Mobile Radio Service Providers	)	

DECLARATION OF DONALD E. ALBERT

I, Donald E. Albert, declare as follows:

1. I am Network Director of Co-Carrier Implementation for Bell Atlantic Network Services, Inc. In that position, I am directly involved with network implementation of co-carrier, unbundling, and collocation arrangements throughout Bell Atlantic's seven states. I am responsible for many of the operational aspects of implementing the Telecommunications Act of 1996 and the Commission's orders in CC Docket No. 96-98 implementing Section 251 of the Act.

2. I have reviewed the petitions seeking reconsideration and clarification of the First Report and Order in the FCC's Interconnection proceeding, CC Docket No. 96-98. Many of the arguments contained in those petitions are factually incorrect and some of the relief sought would be technically infeasible. In particular, I discuss below certain important facts relating to unbundled loops, access to Advanced Intelligent Network ("AIN") databases, collocation of

remote switches and other switching equipment in telephone company central offices, and provision of dark fiber as an unbundled network element.

AIN Unbundling

3. Access to the Service Management Systems ("SMSs") of LEC AIN systems, as required by the Commission, permits competitors to create, modify, or update information in call-related databases. This type of AIN interconnection affords other service providers non-discriminatory access to Bell Atlantic's AIN capabilities while minimizing network reliability and security risks. The capabilities to which other service providers have access are the same ones Bell Atlantic uses to provide its own AIN-based services. Further unbundling of Bell Atlantic's AIN is not technically feasible at this time. In particular, direct access to AIN switch "triggers" would undermine network reliability and security and could cause disruption of customers' services.

4. Bell Atlantic and several other Tier 1 LECs demonstrated in an extensive ex parte filing in the Intelligent Network proceeding that the telephone company would be unable to ensure the integrity of the individual customer's service if a third party were afforded direct access to the customer's switch trigger through its SS7 network. Moreover, a requirement to allow other service providers direct access to individual customers' switch triggers could jeopardize the integrity of other customers' services. The limited mediation functions that are

performed within SS7 networks are not sufficient to protect network integrity and reliability if a number of service providers have direct access to customers' switch triggers.

5. Even putting network integrity and reliability aside, giving a single vendor access to a customer's switch triggers would preclude the end user from purchasing optional services provided by other vendors. By contrast, access at the SMS level allows multiple service providers to offer services using the AIN system. The flexibility to choose services from multiple vendors is one of the important benefits of AIN.

6. Bell Atlantic and other Tier 1 LECs have proposed a national industry-wide project to study access and interconnection requirements among AIN systems. This proposed project is designed to test a number of AIN interconnection issues and to develop and implement uniform nationwide interconnection standards. Such standards will facilitate deployment of new interfaces that will allow other service providers to offer nationwide AIN-based services efficiently over disparate platforms. The results of this project should alleviate concerns that failure to obtain direct access to switch triggers will impair a service provider's ability to provide nationwide service, as a result of the incompatible service creation environments of various AIN systems. Until this project is completed, however, and system changes are made to ensure compatibility, further AIN unbundling is not technically feasible.

Collocation of Remote Switching Equipment

7. Remote switches and packet switches, as their names imply, are switches. While remote switches may be used to multiplex traffic, their principal use is to switch traffic to a collocator's office -- not to provide interconnection or access to unbundled network elements. Similarly, packet switches combine packets from multiple circuits into a single bit stream, then switch them to their destination. Bell Atlantic is familiar with both remote and packet switches and has used both types of equipment for many years primarily to switch customer traffic. Indeed, in state negotiations, AT&T has asked to collocate all vintages of remote switches, including the latest available remote switch which is capable of switching 20,000 local telephone lines. This equals the capacity of -- or is larger than -- many central office switches.

8. It is true that a remote switch cannot perform certain central office switch functions, such as recording and SS7 signaling. These minimal limitations, however, do not change the principal function of a remote switch, which is to connect calls from line to line and line to trunk. In fact, when operated in a stand-alone mode, a remote switch is capable of performing 95% of the functions of a host central office switch. Moreover, like many other types of switches, remote switches can be upgraded to turn the remote into a full-blown host switch.

9. Allowing switching equipment to be collocated would soon exhaust the scarce available collocation space in many offices. For example, some types of remote switches that AT&T plans to use -- when coupled with needed peripheral equipment and work space -- require

a minimum of 400 square feet of office space. As a result, one such device would exhaust the physical collocation space in nearly half of Bell Atlantic's 200 most-requested collocation offices. Allowing collocation of such switches would enable AT&T to use up all of the available collocation space in many of these offices and thereby freeze out other competitors.

10. Based on Bell Atlantic's experience with testing competitors' circuits, collocating remote switches will not facilitate testing and trouble isolation. Such testing will remain equally difficult and will entail manual technician work whether or not the remote switches are collocated.

Dark Fiber

11. Dark fiber is not a "network element" that can be unbundled. Dark fiber is not "used" to provide telecommunication services, nor is it capable of such use without adding electronics. It is not even connected to the telecommunications network. Unlike network elements, which are subparts of an existing telecommunications service (e.g., local switching or local loop), dark fiber is simply optical cable that is being stored on-site (in the ground) for future use. It can be compared to a telephone pole that is being stored until needed, or a circuit pack that is placed in a storage cabinet in a central office waiting to be installed in the network.

12. Bell Atlantic installs dark fiber primarily to meet projected future service requirements. As carrier of last resort, Bell Atlantic must have sufficient capacity to serve the

reasonably anticipated needs of its customers. Only when the expected demand materializes, will Bell Atlantic "light" the cable by installing electronics and connect the facility to the network. If Bell Atlantic is forced to sell its spare facilities to its competitors, customers may need to wait protracted periods of time for new or expanded telephone service, and Bell Atlantic will be unable to meet its regulatory obligations as the carrier of last resort in a timely manner.

13. In addition to delaying service, a forced sale of dark fiber could increase prices to all customers. Bell Atlantic frequently places spare dark fiber facilities at the time as it installs "lit" facilities to serve immediate customer needs. This avoids duplicate installation costs and the need to reopen streets or pull new cables on an emergency basis to meet service requests. If new entrants were permitted to deprive Bell Atlantic of the use of that cable, these economies would be lost, and Bell Atlantic would need to undertake disruptive and expensive emergency construction to meet new service requests. The result would be increased local service prices to all customers.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 30, 1996.

Donald E. Albert

Donald E. Albert

Marleen L. Wiseman

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 1996 a copy of the foregoing "Opposition of Bell Atlantic to Petitions for Reconsideration" was sent by first class mail, postage prepaid, to the parties on the attached list.

Tracey DeVaux

* Via hand delivery.

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